

Allegheny County Health Department

COUNTY COMMISSIONERS

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Assistant Solicitor



BUREAU OF ENVIRONMENTAL QUALITY
301 Thirty-ninth Street
Pittsburgh, PA 15201-1891

September 9, 1994

RECEIVED

SEP 30 1994

CASE DEVELOPMENT SECTION
EPA Region III

RECEIVED

George T. Weber, Jr., Plant Manager
USS Clairton Works
USX Corporation
400 State Street
Clairton, PA 15025

(412) 578-8132
FAX: (412) 578-8058

SEP 27 1994

AIR, RADIATION & TOXICS
Division

RE: Statement of Violations No. 940903 - USS Clairton Works,
April - June, 1994

Dear Mr. Weber:

A Statement of Violations with regard to the USX Corporation USS Division Clairton Works, 400 State St., Clairton, 15025 (USS), have been turned over to my office for appropriate enforcement action. Specifically this letter addresses over 19 alleged violations (observed by County inspectors and from USX reports) of various provisions of Articles XX and XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control ("Articles XX and XXI"), at your company's Clairton Works from April 1, 1994, through June 30, 1994. This letter also constitutes an offer to settle these alleged violations, without the cost and burden of litigation, by payment of a civil penalty to the County in the amount of \$10,175.00 no later than twenty (20) days from the date of this letter.

These alleged air pollution control violations at your Allegheny County Clairton Works coke plant involve the following:

- Excessive visible emissions (V.E.'s) from the:
 - Charging of battery B, in violation of Section 520.B. of Article XX or Section 2105.21.a of Article XXI;
 - Pushing of batteries 3, 19, and 20, in violation of Section 520.F.2. of Article XX or Section 2105.21.e.4 of Article XXI;

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- Transport of hot coke from batteries 3, 19, and 20, in violation of Section 520.F.3. of Article XX or Section 2105.21.e.5 of Article XXI;
- Failure to properly utilize the required pollution control system for the pushing operations at Batteries 1, 2, 3, 7, 8, 9, 13, 15, 19, and 20 in violation of Section 520.F. or 804.C. of Article XX or Section 2105.21.e of Article XXI;
- Failure to properly utilize the required pollution control system for the desulfurization operations for all batteries, in violation of Section 804.C. of Article XX; and
- Emission of undesulfurized coke oven gas into the open air in violation of Section 530. of Article XX or Section 2105.21.h of Article XXI.

Summaries of the alleged violations and the basis for this settlement offer are enclosed with this letter. If USS chooses to accept this offer a civil penalty payment in the amount of \$10,175.00 by check payable to the "Allegheny County Health Department Clean Air Fund" must be received by this office, at the address above no later than 20 days from the date of this letter. If such penalty payment is made in accordance with this offer, this Bureau, by this letter, hereby agrees to accept such penalty in full satisfaction of all violations alleged herein, without any final determination of law or fact, and hereby agrees to not seek any further penalties or remedial actions for such alleged violations.

This Bureau prefers to settle alleged violations such as these rather than initiating litigation. A failure to accept this settlement offer by the deadline stated, however, will result in formal enforcement action by this Bureau, including, but not limited to, the filing of summary criminal complaints before the designated district justice, the filing of civil penalty proceedings before the County Air Pollution Control Civil Penalty Hearing Board, and/or the issuance of appropriate enforcement orders and orders for information to determine compliance. In addition, the settlement terms acceptable to this Bureau will increase after such deadline since additional enforcement resources will be committed to this matter.

The amount of the civil penalty payment from your company which has been offered to settle the April - June, 1994, violations in the above-referenced areas is based on the nature, severity, and frequency of the alleged violations, on the potential summary

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criminal penalties, upon conviction, of \$100 to \$2,500 per violation per day, and on the potential civil penalties of up to \$10,000 per violation and \$2,500 per violation per day for continuing violations. Also considered are such things as the health effects of the pollutants involved, the apparent willful or inadvertent nature of the violations, any potential impacts on the public, any actions taken, or being taken, by your company (that have been reported to this Bureau) to minimize the violations or prevent future violations, and the compliance history of the source.

For your information, Bureau records indicate that at the following types of emission points during this three month period the Bureau conducted the following number of inspections at your facility: Charging, 12; Door Areas, 12; Charging Ports, 15; Offtake Piping, 15; Pushing, 72; and Combustion Stacks, 94. Neither this settlement offer nor your company's acceptance of this offer will affect the U.S. EPA's or PA DER's rights to take any enforcement actions for violations of the federal clean air act, federal regulations, state laws and regulations, or applicable federal court consent decree. Thank you for your anticipated prompt attention to this matter.

Very truly yours,



Gary T. Zolyak,
Assistant County Solicitor

MJM

Enclosure

cc: Stephen K. Todd (w/ Enclosure)
Richard Dworek (" ")
H. R. McCollum (" ")
Thomas J. Maslany (" ")
Joseph Pezze (" ")

ALLEGHENY COUNTY HEALTH DEPARTMENT
BUREAU OF ENVIRONMENTAL QUALITY
Coke Plant Performance Data
USX CORPORATION - USS CLAIRTON WORKS
Coke Plant Performance Data
2nd Quarter (April, May, June) 1994

SUMMARY

<u>Source</u>	<u>Violations</u>		<u>Civil Penalty</u>	
	<u>(except</u>	<u>non-de minimus</u>	<u>Settlement Offer</u>	
	<u>as noted)</u>			
Visible Emissions				
Charging	1	1	x \$	925.00 = \$ 925.00
Door Areas	0	0		
Charging Ports	0	0		
Offtake Piping	0	0		
Pushing				
with control device	4	4	x \$	925.00 = \$ 3,700.00
transport w/o control device	6	6	x \$	925.00 = \$ 5,550.00
Combustion Stacks				
20% Opacity Std.	0	0		
60% Opacity Std.	0	0		
Pushing Control Unavailability 1.79%		0(a)		
Coke Oven Gas Desulfurization				
Performance	2	0		
Unavailability (b)	28.35 %			
Breakdown Reporting	0	0		
Flaring of Raw Coke Oven Gas	6(c)	0		
Venting of Raw Coke Oven Gas	0 (c)	0		
Monthly & Monitoring Reports (timeliness, completeness)	0	0		
Total	19+	11		\$10,175.00

Notes: (a) Based on individual battery unit monthly performance.

(b) Unavailability of part of the desulfurization unit may not cause exceedance of the standard. Unavailability for the second quarter involved mostly outages of spare equipment or equipment for which spares are provided; desulfurization unit was in compliance 98% of the time.

(c) Number of battery 15-minute periods, or part thereof, of venting.

ALLEGHENY COUNTY HEALTH DEPARTMENT
DIVISION OF AIR QUALITY
USX CORPORATION - USS CLAIRTON WORKS
Coke Plant Performance Data
2nd Quarter (April, May, June) 1994

<u>SOURCE</u>	<u>BATTERY</u>	<u>DATE</u>	<u>OBSERVATIONS</u>
<u>Visible Emissions</u>			
Charging	B	04/18	80 sec.
Door Areas		NO VIOLATIONS	
Charging Ports		NO VIOLATIONS	
Offtake Piping		NO VIOLATIONS	
Pushing			
w/control device	19	05/03	5 secs. $\geq 20\%$ (40% max.)
20% standard	20	05/03	8 50
	20	05/04	4 40
	03	06/29	9 70
Transport in open	19	05/03	16 secs. $> 10\%$ (45% max.)
atmosphere	20	05/03	7 30
10% standard	20	05/03	5 25
	20	05/03	6 25
	20	05/04	8 25
	03	06/29	5 35
Combustion Stacks			
20% standard		NO VIOLATIONS	
60% standard		NO VIOLATIONS	

ALLEGHENY COUNTY HEALTH DEPARTMENT
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USX CORPORATION - USS CLAIRTON WORKS
Coke Plant Performance Data
2nd Quarter (April, May, June) 1994

Pushing Control System Unavailability

BATTERY NO.	UNCONTROLLED PUSHES	
	MONTH/YEAR	%
1,2,3	04/94	2.33
	05/94	2.32
	06/94	3.57
7,8,9	04/94	0.80
	05/94	1.88
	06/94	0.45
13,14,15	04/94	1.75
	05/94	0.56
	06/94	1.37
19 & 20	04/94	3.24
	05/94	3.58
	06/94	2.37
B	04/94	0.00
	05/94	0.00
	06/94	0.00
Total Pushes (12 Batteries):		94,101

Coke Oven Gas Desulfurization

Performance 05/20,21

Unavailability 04/11

 05/6-12,17-21

 06/7,10-25

Total: 26 24-hr period(s), or
part thereof, w/o full use of
the desulfurization process.

Note: Unavailability of the desulfurization unit for the second
quarter involved mostly outages of spare equipment or
equipment for which spares are provided; the desulfuriza-
tion unit was in compliance 98% of the time (89 of 91 days).

ALLEGHENY COUNTY HEALTH DEPARTMENT
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2nd Quarter (April, May, June) 1994

Delayed Breakdown Reporting

NO VIOLATIONS

Emission/Flaring of Raw Coke Oven Gas

<u>Emission Incident (date)</u>	<u>DAQ Breakdown (No.)</u>	<u>Battery (No.)</u>	<u>Emission (start and end time)</u>	<u>Periods(a.) of Emission</u>	<u>Emission (vented or flared)</u>
04/25/94	(b.)	7	0425:00-0425:10	1	Flared
05/20/94	(b.)	7	0135:00-0135:10	1	Flared
05/23/94	(b.)	7	0310:00-0310:10	1	Flared
05/23/94	(b.)	7	0750:00-0750:10	1	Flared
05/23/94	(b.)	7	0815:00-0815:10	1	Flared
06/03/94	(b.)	7	0605:00-0606:20	1	Flared

a. Number of battery-15-minute periods or part thereof, of
emission(s).

b. Incidents less than 2 minutes duration not reported in real time,
but summarized in Process Information Report submitted to DAQ by
USS.

Monitoring/Monthly Reports

NO VIOLATIONS

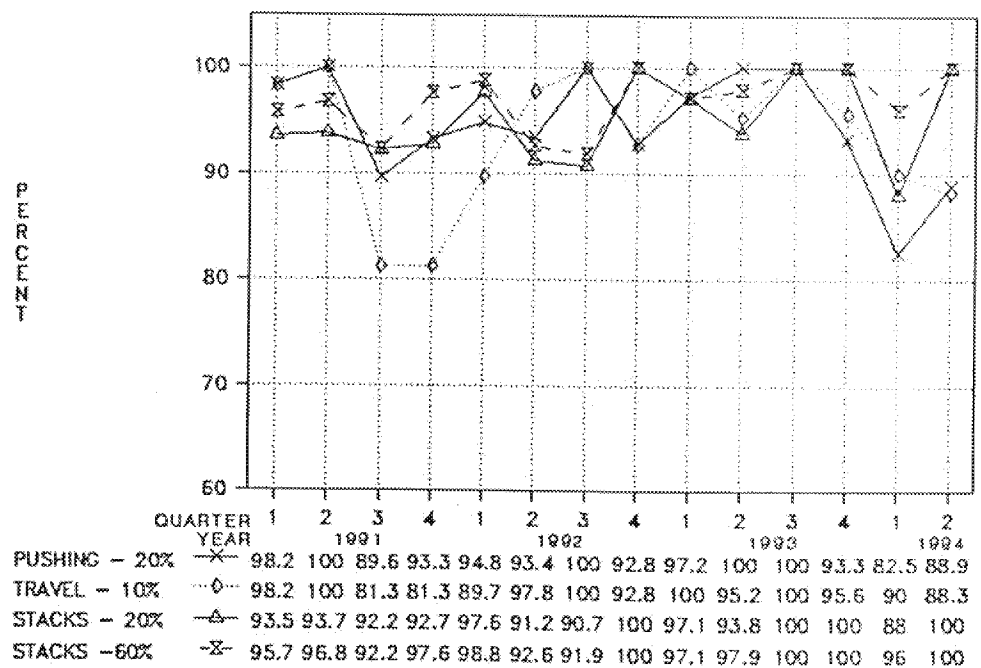
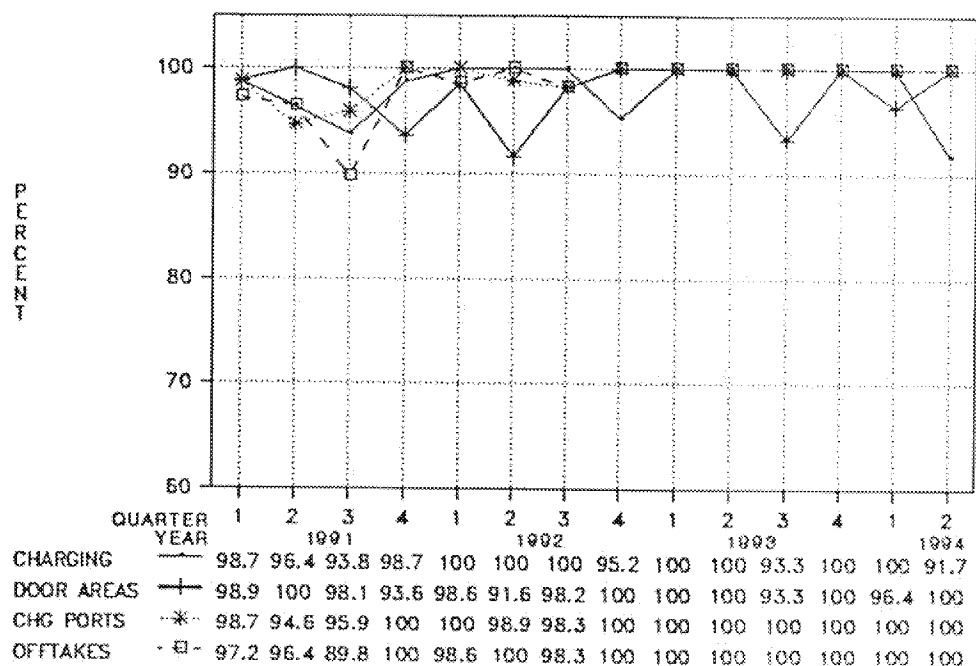
ALLEGHENY COUNTY HEALTH DEPARTMENT
BUREAU OF ENVIRONMENTAL QUALITY
DIVISION OF AIR QUALITY
Coke Plant Enforcement Data
USS Clairton Coke Works
2nd Quarter (April, May, June) 1994

CONTROL NUMBER	BREAKDOWN DATE	STRT TIME	BREAKDOWN END DATE	END TIME	DAO RECEIVED DATE	ANSWER DATE	REC'D DATE	OW-CALL DATE	REC'D DATE	SOURCE	EQUIPMENT	EXPLANATION
94-0084	04/04/94	0710	04/04/94	1125	04/04/94	0720	/	/	/	#1-3 BATTERY	PEC SYSTEM	REPLACE BROKEN HOOD CAR DRIVE WHEEL AXLE
94-1092	04/09/94	0830	04/09/94	1340	/	/	/	/	/	#1-3 BATTERY	PEC SYSTEM	REPAIR NO. 3 DOOR MACHINE COKE GUIDE STEAM DAMPERS LIMIT SWITCH
94-0067	04/11/94	0530	04/11/94	0730	/	/	/	/	/	DESULT PLANT	DESULT PLANT	NO. 1 BOILER SHUT DOWN DUE TO FAN MOTOR FAILURE CAUSING COSE AXI-MACHINE TO TRIP
94-0068	04/19/94	0840	04/19/94	1005	04/12/94	0927	/	/	/	#1-3 BATTERY	PEC SYSTEM	RECALIBRATE HOOD CAR POSITIONING SYSTEM
94-0071	04/18/94	1330	04/18/94	1605	04/15/94	0843	/	/	/	#19-20 BATTERY	PEC SYSTEM	ADJUST DUCT BELT LENGTH
94-0073	04/20/94	0735	04/20/94	1200	04/18/94	0738	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR DUCT DEFLECTOR SHIELD; COMPRESS SHIELD FILL & WEDGED IN BACKHOUSE COLLECTOR HOPPER
94-0075	04/20/94	1800	04/20/94	1905	04/20/94	0738	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR DUCT BELT
94-0078	04/20/94	1330	04/22/94	1300	04/22/94	1335	/	/	/	#1-3 BATTERY	PEC SYSTEM	REPAIR DUCT BELT
94-1105	04/20/94	1420	04/20/94	1400	04/22/94	1310	/	/	/	#1-3 BATTERY	PEC SYSTEM	REPAIR DUCT BELT
94-0081	03/08/94	0700	05/02/94	0900	/	/	/	/	/	#19-20 BATTERIES	PEC SYSTEM	BENCHMARK STATION COMPUTER MONITOR FAILED - THUNDERSTORM POWER SURGE
94-1108	03/08/94	1440	05/02/94	2130	05/06/94	1450	/	/	/	CLAS PLANT	CLAS PLANT	REMOVE SLACK FROM HOOD CAR DRIVE CABLE
94-0082	03/16/94	0700	05/06/94	2100	05/16/94	0750	/	/	/	#1-3 BATTERY	PEC SYSTEM	PA STATE BOILER INSPECTION
94-1112	03/15/94	1205	05/15/94	1330	05/15/94	1242	/	/	/	#19-20 BATTERIES	PEC SYSTEM	REPAIR DUCT BELT TEAR
94-0084	05/17/94	0900	05/21/94	0900	05/17/94	0905	/	/	/	DESULT PLANT	DESULT PLANT	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-1114	05/20/94	1350	05/26/94	1735	05/20/94	2147	/	/	/	#1-3 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-1117	05/20/94	2100	05/26/94	2300	/	/	/	/	/	#19-20 BATTERIES	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-0086	05/20/94	1315	05/26/94	1635	/	/	/	/	/	#19-20 BATTERIES	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-1128	05/20/94	1315	05/26/94	1635	/	/	/	/	/	#19-20 BATTERIES	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-0088	06/01/94	1100	06/01/94	1300	06/01/94	1105	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-0101	06/03/94	0930	06/03/94	1630	06/03/94	0940	/	/	/	DESULT PLANT	DESULT PLANT	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-0102	06/10/94	1000	06/25/94	1800	06/10/94	1020	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-1141	06/12/94	1515	06/12/94	1830	/	/	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-0103	06/13/94	1800	06/13/94	2115	06/13/94	1025	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-1144	06/18/94	1845	06/18/94	2050	/	/	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-1145	06/18/94	1830	06/18/94	2050	/	/	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-1146	06/18/94	2350	06/18/94	2350	/	/	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-0113	06/20/94	1335	06/20/94	1445	/	/	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-1148	06/22/94	2330	06/22/94	2400	/	/	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
94-0120	06/27/94	1425	06/27/94	1605	06/27/94	1445	/	/	/	#1-3 BATTERY	PEC SYSTEM	REPAIR BROKEN HOOD CAR DRIVE WHEEL AXLE
P094024	04/06/94	0915	04/06/94	1830	04/01/94	0810	/	/	/	#19-20 BATTERIES	PEC SYSTEM	REPLACE DUCT BELT; MISC. BACKHOUSE MAINTENANCE
P094026	04/13/94	0740	04/13/94	2145	04/08/94	0915	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPLACE HOOD CAR NO. 8 QUENCH TOWER USED DURING OUTAGE
P094027	04/20/94	0900	04/20/94	1300	04/15/94	0915	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPLACE HOOD CAR BELT LIFTING ROLLERS
P094028	04/27/94	0800	04/28/94	1300	04/22/94	1345	/	/	/	#19-20 BATTERY	PEC SYSTEM	WELD HOOD CAR SUPPORTS
P094030	04/27/94	0855	04/27/94	1435	04/25/94	1300	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPLACE DUCT BELT AND DRIVE CABLE
P094031	05/03/94	0900	05/03/94	1415	05/02/94	0945	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPLACE DRIVE CABLE
P094032	05/11/94	0800	05/12/94	2015	05/08/94	1558	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPLACE DEFLECTOR SHIELD IN BACKHOUSE COLLECTOR
P094033	05/19/94	0800	05/19/94	2015	05/18/94	0800	/	/	/	#19-20 BATTERY	PEC SYSTEM	REPAIRS BACKHOUSE DUCTWORK DEFLECT SHIELD; HOOD CAR DRIVE WHEEL REPLACE & CABLE ADJ., STRUCT. INSP.
P094036	05/24/94	0830	05/24/94	1230	05/23/94	1140	/	/	/	#1-3 BATTERY	PEC SYSTEM	REPLACE DUCT BELT & PLENUM; DUCT STRUCTURAL REPAIRS
P094038	05/25/94	0800	05/25/94	1240	05/23/94	0915	/	/	/	#1-3 BATTERY	PEC SYSTEM	REPLACE DUCT BELT & PLENUM; DUCT STRUCTURAL REPAIRS
P094039	06/02/94	0900	06/03/94	0900	05/31/94	0850	/	/	/	#1-3 BATTERY	PEC SYSTEM	REPLACE DUCT BELT & PLENUM; DUCT STRUCTURAL REPAIRS
P094041	06/08/94	0700	07/05/94	1500	06/20/94	0825	/	/	/	#1-3 BATTERY	PEC SYSTEM	REPLACE DUCT BELT & PLENUM; DUCT STRUCTURAL REPAIRS
P094044	06/21/94	0700	06/21/94	2015	06/20/94	1034	/	/	/	COKE WORKS	PEC SYSTEM	REPLACE DUCT BELT & PLENUM; DUCT STRUCTURAL REPAIRS

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Coke Plant Enforcement Data
USX CORPORATION - USS CLAIRTON WORKS
2nd Quarter (April, May, June) 1994

<u>SOURCE</u>	<u>TOTAL INSPECTIONS</u>	<u>VIOLATIONS</u>	<u>COMPLIANCE</u>
CHARGING	12	1	91.7%
DOOR AREAS	12	0	100.0
CHARGING PORTS	15	0	100.0
OFFTAKES	15	0	100.0
PUSHING			
Pushing \geq 20%	36	4	88.9
Travel > 10%	36	6	83.3
STACKS			
\geq 20%	47	0	100.0
\geq 60%	47	0	100.0

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